

# Fact Sheet



## For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-04100009-2012**  
Application Received: **December 15, 2011**  
Plant Identification Number: **041-00009**  
Permittee: **Equitrans, L.P.**  
Facility Name: **Copley Run Compressor Station #70**  
Mailing Address: **Route 4, Box 640 Weston, WV 26452**

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Physical Location: Weston, Lewis County, West Virginia  
UTM Coordinates: 541.30 km Easting • 4314.80 km Northing • Zone 17  
Directions: Interstate 79 to Exit 91. Proceed toward Weston for approximately 1 mile, take a left onto Copley Road (Route 17). The station is approximately ½ mile on the left.

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### Facility Description

Copley Run Compressor Station #70 is a natural gas transmission facility covered under Standard Industrial Classification (SIC) Code 4922. The station has the potential to operate twenty-four (24) hours per day, seven (7) days per week. This station consists of three (3) 1350 hp compressor engines, one (1) 2250 hp compressor engine, one (1) 1800 hp compressor engine, two (2) 2.2 MMBtu/hr natural gas fired electric generators, one (1) 0.675 MMBtu/hr natural gas fired boiler, one (1) 0.03 MMBtu/hr natural gas fired hot water heater, two (2) triethylene glycol dehydration units, one (1) flare and six (6) tanks of various sizes.

### Emissions Summary

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Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2011 Actual Emissions
Carbon Monoxide (CO)	198.71	63.4
Nitrogen Oxides (NO <sub>x</sub> )	533.77	509.8
Particulate Matter (PM <sub>10</sub> )	12.86	5.834

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<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2011 Actual Emissions</b>
Total Particulate Matter (TSP)	12.86	7.8
Sulfur Dioxide (SO <sub>2</sub> )	0.17	0.1
Volatile Organic Compounds (VOC)	44.98	20.3
<i>PM<sub>10</sub> is a component of TSP.</i>		
<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2011 Actual Emissions</b>
Total HAPs	21.90	11.78
Benzene	0.75	0.2941
Ethylbenzene	0.18	0.0164
Toluene	0.45	0.1658
Xylene	0.28	0.1544
n-Hexane	0.29	0.0242
Formaldehyde	14.49	8.5

*Some of the above HAPs may be counted as PM or VOCs.*

### **Title V Program Applicability Basis**

This facility has the potential to emit 198.71 tons per year of Carbon Monoxide, 533.77 tons per year of Nitrogen Oxides, and 14.49 tons per year of Formaldehyde. Due to this facility's potential to emit over 100 tons per year of criteria pollutant and over 10 tons per year of a single HAP, Equitrans, L.P. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

### **Legal and Factual Basis for Permit Conditions**

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	Opacity and PM limits for fuel burning units
	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	New Source Review Permit requirements
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants Pursuant to 40 C.F.R. Part 63
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. 63 Subpart HH	Natural Gas Production Facilities MACT
	40 C.F.R. 63 Subpart HHH	Natural Gas Transmission and Storage Facilities MACT
	40 C.F.R. 63 Subpart ZZZZ	RICE MACT

	40 C.F.R. Part 64 40 C.F.R. Part 82, Subpart F	Compliance Assurance Monitoring Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

### Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-2397B	May 7, 2007	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

### Determinations and Justifications

Since the last renewal in 2007, there have not been any changes in equipment at this facility. The 40 C.F.R. 64 Compliance Assurance Monitoring (CAM) requirements for the flare on Dehy 004-01 also remain unchanged except for the addition of CAM citations to condition 6.2.2 and the addition of general CAM requirements for monitoring, recordkeeping, and reporting as conditions 6.2.3 through 6.2.8, 6.4.9, 6.4.10 and 6.5.5.

Condition 6.1.8 was added to this permit for opacity limit of the reboiler (Emission Unit ID- 004-01). Compliance with this requirement will be met by complying with the fuel restriction in Section 6.1.5.b.

Since the date for initial opacity testing required under Condition 6.3.2 has already passed, this requirement was updated from "within thirty (30) days of issuance of Permit R13-2397B (issued May 7, 2007)" to "within one (1) year of permit issuance and a second opacity test within one (1) year of the time the permit expires" to allow for ongoing compliance testing.

Since PTE of formaldehyde is > 10 tpy, this facility is a major source of HAPs. The compressor engines (Emission Point IDs- C-001 through C-005) are non-emergency SI 2SLB units > 500 hp installed prior to 12/19/2002 located at a major source. As such, there are no requirements for those under 40 C.F.R. 63 Subpart ZZZZ per §§63.6590(b)(3)(i) and 63.6600(c).

The Electric generators (Emission Point IDs- G-001 and G-002) are emergency SI 4SRB units < 500 hp installed prior to 6/12/06 located at a major source of HAPs. These generators have applicable requirements under RICE MACT (40 CFR 63, Subpart ZZZZ). These requirements are added in section 7.0 of this permit.

Dehy #2 (004-02) is subject to 40 C.F.R. 63 Subpart HHH as it is at a transmission and storage facility at a major source of HAPs. The new 40 C.F.R. 63 Subpart HHH (published on August 16, 2012) no longer has the benzene exemption under 40 C.F.R. §63.1274(d)(2). Therefore, Condition 6.4.9 which contained the benzene exemption was removed from the permit along with the reference to Condition 6.4.9 in Condition 6.3.1. 40 C.F.R. 63, Subpart HHH applicable requirements for Dehy #2 (004-02) have been added as Section 9.0.

Dehy #1 (004-01) is part of the natural gas production facility. The production facility is not a major source of HAPs in accordance with the definition of a major source in 40 C.F.R. §63.761. Dehy #1 is subject to 40 C.F.R. 63 Subpart HH as an area source of HAPs with benzene emissions less than 1 ton per year. The 40 C.F.R. 63 Subpart HH requirements have been added as Section 8.0. In addition to the requirements under 40 C.F.R. 63 Subpart HH, monitoring, testing, recordkeeping, and reporting to demonstrate compliance with the area source status and 1 ton per year benzene exemption were added as Conditions 8.2.1, 8.3.1, 8.4.1, and 8.5.1.

Dehy #1 (004-01) has pre-controlled potential emissions that exceed major source thresholds for volatile organic compounds (VOC) and hazardous air pollutants (HAPs), and is equipped with a flare that is used to comply with federally-enforceable emission limits associated with the dehy operation. Therefore, Dehy #1 represents two pollutant specific emissions units (PSEUs), one for volatile organic compounds (VOC) and one for hazardous air pollutants (HAPs). Since one control device is common to both PSEUs, one monitoring plan was submitted in accordance with 40 CFR §64.4(f). The submitted plan meets the requirements of the CAM rule for the Dehy #1 (004-01) flare controlling VOCs and HAPs from the dehydration unit.

Monitoring per the CAM Plan for VOC and HAP emissions will be as follows:

		Indicator No. 1
<b>I.</b>	<b>Indicator</b>	Presence of Flame (permit condition 6.1.5.g.)
	<b>Monitoring Approach</b>	Use of thermocouple, infrared device, or equivalent (permit condition 6.2.2.).
<b>II.</b>	<b>Indicator Range or Designated Condition</b>	Indicator provides data regarding presence or absence of flame.
<b>III.</b>	<b>Performance Criteria</b>	A thermocouple, infrared detector, pilot eye, or equivalent device will be installed to continuously monitor the presence of a pilot flame (permit condition 6.2.2.).
	<b>A. Data Representativeness</b>	
	<b>B. Verification of Operational Status</b>	All manufacturer's recommendations regarding periodic testing/checks for the proper installation and operation of the pilot eye device will be followed (permit condition 6.4.1.).
	<b>C. QA/QC Practices and Criteria</b>	For the device that detects the presence of a flame, calibration, maintenance and operation will be conducted in accordance with manufacturer's specifications (permit condition 6.4.1.).
	<b>D. Monitoring Frequency</b>	Continuously
	<b>Data Collection Procedures</b>	Records of all flame outs or loss of pilot eye, along with any applicable corrective actions will be documented and maintained (permit condition 6.4.4.).
	<b>Data averaging periods</b>	No averaging periods

## Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

- a. 40 CFR part 60 Subpart Dc - The boilers at Copley Run station are below 10 mmBtu/hr.
- b. 40 CFR part 60 Subpart GG - There are no turbines at Copley Run station.

- c. 40 CFR part 60 Subparts K, Ka - All tanks at Copley Run station are less than 40,000 gallons in capacity.
- d. 40 CFR part 60 Subpart KKK - Copley Run station is not engaged in the extraction of natural gas liquids from field gas or in the fractionation of mixed natural gas liquids to natural gas products.
- e. 40 CFR part 60 Subpart LLL - There are no sweetening units at Copley Run station.
- f. 40 CFR part 60 Subpart IIII - The engines at Copley Run Station are not stationary compression ignition (CI) internal combustion engines (ICE).
- g. 45CSR27 - Natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45CSR§27-2.4 exempts equipment “used in the production and distribution of petroleum products providing that such equipment does not produce or contact materials containing more than 5% benzene by weight.”
- h. Prevention of Significant Deterioration and Title V Greenhouse Gas Tailoring Rule - The facility has not submitted any application for a PSD modification; therefore, the requirements of the GHG tailoring rule are non-applicable.

### **Request for Variances or Alternatives**

None

### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date: October 24, 2012  
Ending Date: November 26, 2012

All written comments should be addressed to the following individual and office:

Beena Modi  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

**Point of Contact**

Beena Modi  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1228 • Fax: 304/926-0478

**Response to Comments (Statement of Basis)**

N/A